

Hon. Paul A. Engelmayer  
United States District Court  
for the Southern District of New York  
40 Foley Square, Room 2201  
New York, NY 10007

July 11, 2024

**Re: Jane Street Group, LLC v. Millennium Management LLC, Douglas Schadewald,  
and Daniel Spottiswood, No. 1:24-cv-02783**

Dear Judge Engelmayer:

We write on behalf of Defendants Douglas Schadewald (“Schadewald”), Daniel Spottiswood (“Spottiswood,” and together with Schadewald, “Individual Defendants”) and Millennium (together with Individual Defendants, “Defendants”). Pursuant to Local Civil Rule 7.1(d) and Individual Practice Rule 4.B, we seek permission to file under seal Defendants’ Letter Motion to Compel Document Discovery (the “Letter Motion to Compel”) and the exhibits to the Declaration of Brian R. Campbell in Support of Defendants’ Letter Motion to Compel Document Discovery (the “Exhibits”).

The Letter Motion to Compel and the Exhibits discuss areas of discovery related to Jane Street’s business. Exhibits 6 and 7 are documents produced by Jane Street and designated as Highly Confidential – Attorney’s Eyes Only. Exhibit 8 is Jane Street’s First Amended Identification of Trade Secrets (July 2, 2024), which Jane Street designated as Highly Confidential – Attorney’s and Individual Defendants’ Eyes Only. Exhibit 3 is Jane Street’s Responses and Objections to Defendants’ First Set of Requests for Production, Exhibits 2, 4, and 5 are correspondence between counsel concerning the same, and Exhibit 1 is a summary reference chart concerning the same. The Letter Motion to Compel cites to, paraphrases, or quotes from each of the Exhibits. Because Defendants believe that Plaintiff will seek to seal some or all of the Letter Motion to Compel and the Exhibits, Defendants request leave to provisionally file the Letter Motion to Compel and the Exhibits under seal. Defendants will meet and confer with Plaintiff regarding sealing or redactions of the Letter Motion and Exhibits, and to the extent Plaintiff consents, file public redacted versions by close of business on Monday, July 15, 2024. Defendants reserve the right to challenge any redactions proposed by Plaintiff.

Respectfully submitted,

/s/ Brian R. Campbell  
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